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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JUN 19 2018

SEAN F. McAVOY, CLERK  
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UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRAULIO JIMENEZ,  
REYNALDO PEREZ MUÑOZ,  
VICTOR JIMENEZ,  
ANNA MUÑOZ, and  
MARISELA MENDOZA,

Defendants.

4:18-CR-6008-EFS

SUPERSEDING INDICTMENT

Vio: 21 U.S.C. § 846  
Conspiracy to Distribute 50 Grams  
or More of Actual (Pure)  
Methamphetamine, 5 Kilograms or  
More of Cocaine, and 1 Kilogram  
or More of Heroin (Count 1)

Vio: 18 U.S.C. § 1956(a)(1)(B)(i)  
Money Laundering  
(Counts 2, 3, and 4)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii) and 18 U.S.C. § 2  
Possession with the Intent to  
Distribute 50 Grams or More of  
Actual (Pure) Methamphetamine  
(Count 5)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(i) and 18 U.S.C. § 2  
Possession with the Intent to  
Distribute 1 Kilogram or More of  
Heroin (Count 6)

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Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(vi) and 18 U.S.C. § 2  
Possession with the Intent to  
Distribute 5 Kilograms or more of  
Cocaine (Count 7)

Vio: 21 U.S.C. § 841(a)(1),  
(b)(1)(A)(ii) and 18 U.S.C. § 2  
Possession with the Intent to  
Distribute 400 Grams or more of  
Fentanyl (Count 8)

21 U.S.C. § 853, 18 U.S.C. § 982  
Forfeiture Allegations

The Grand Jury Charges:

COUNT 1

Beginning on a date unknown but by on or about December 19, 2017,  
continuing until on or about February 14, 2018, in the Eastern District of  
Washington and elsewhere, the Defendants, BRAULIO JIMENEZ, REYNALDO  
PEREZ MUÑOZ, ANNA MUÑOZ, and MARISELA MENDOZA did knowingly  
and intentionally combine, conspire, confederate and agree together with each  
other and other persons, both known and unknown to the Grand Jury, to commit  
the following offense against the United States, to wit: distribution of 50 grams or  
more of actual (pure) Methamphetamine, a Schedule II controlled substance, 5  
kilograms or more of a mixture or substance containing a detectable amount of  
Cocaine, a Schedule II controlled substance, and 1 kilogram or more of a mixture

1 or substance containing a detectable amount of Heroin, a Schedule I controlled  
2 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(i), (ii), (viii); all in  
3 violation of 21 U.S.C. § 846.

5 COUNT 2  
6

7 On or about December 21, 2017, in the Eastern District of Washington, the  
8 Defendant, REYNALDO PEREZ MUÑOZ, did knowingly conduct and attempt to  
9 conduct a financial transaction affecting interstate and foreign commerce, to wit:  
10 the transfer, delivery and other disposition of \$380,070.00 in U.S. funds at the  
11 direction of a target subject which involved the proceeds of a specified unlawful  
12 activity, that is conspiracy to distribute and the distribution of controlled  
13 substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing  
14 that the transaction was designed in whole or in part to conceal and disguise the  
15 nature, the location, the source, the ownership, and the control of the proceeds of  
16 the specified unlawful activity, and that while conducting and attempting to  
17 conduct such financial transaction knew that the property involved in the financial  
18 transaction, that is funds in the amount of \$380,070.00 represented the proceeds of  
19 some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and  
20 2.  
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22 COUNT 3  
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24 On or about January 9, 2018, in the Eastern District of Washington, the  
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Defendants, REYNALDO PEREZ MUÑOZ and BRAULIO JIMENEZ, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: the transfer, delivery and other disposition of \$630,200.00 in U.S. funds at the direction of a target subject which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is funds in the amount of \$630,200.00 represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

COUNT 4

On or about February 2, 2018, in the Eastern District of Washington, the Defendants, REYNALDO PEREZ MUNOZ and BRAULIO JIMENEZ, did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: the transfer, delivery and other disposition of \$280,000.00 in U.S. funds at the direction of a target subject which involved the proceeds of a specified unlawful activity, that is conspiracy to distribute and the

1 distribution of controlled substances, in violation of 21 U.S.C. §§ 841(a)(1),  
2 (b)(1)(A), and 846, knowing that the transaction was designed in whole or in part  
3 to conceal and disguise the nature, the location, the source, the ownership, and the  
4 control of the proceeds of the specified unlawful activity, and that while  
5 conducting and attempting to conduct such financial transaction knew that the  
6 property involved in the financial transaction, that is funds in the amount of  
7 \$280,000.00 represented the proceeds of some form of unlawful activity in  
8 violation of 18 U.S.C. §§ 1956(a)(1)(B)(i), and 2.

## COUNT 5

14 On or about February 14, 2018, in the Eastern District of Washington, the  
15 Defendants, BRAULIO JIMENEZ, VICTOR JIMENEZ, and MARISELA  
16 MENDOZA, knowingly and intentionally possessed with intent to distribute 50  
17 grams or more of actual (pure) methamphetamine, a Schedule II controlled  
18 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii) and 18 U.S.C. § 2.

## COUNT 6

22 On or about February 14, 2018, in the Eastern District of Washington, the  
23  
24 Defendants, BRAULIO JIMENEZ, VICTOR JIMENEZ, and MARISELA  
25 MENDOZA, knowingly and intentionally possessed with intent to distribute 1  
26 kilogram or more of a mixture or substance containing a detectable amount of  
27  
28 heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1),

(b)(1)(A)(i) and 18 U.S.C. § 2.

COUNT 7

On or about February 14, 2018, in the Eastern District of Washington, the Defendants, BRAULIO JIMENEZ, VICTOR JIMENEZ, and MARISELA MENDOZA, knowingly and intentionally possessed with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(ii) and 18 U.S.C. § 2.

COUNT 8

On or about February 14, 2018, in the Eastern District of Washington, the Defendants, BRAULIO JIMENEZ, VICTOR JIMENEZ, and MARISELA MENDOZA, knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi) and 18 U.S.C. § 2.

## NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853 and 18 U.S.C. § 982.

1                   CONTROLLED SUBSTANCE FORFEITURES

2                   Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of  
3                   21 U.S.C. §§ 841, 846 or 21 U.S.C. § 841, as set forth in this Superseding  
4                   Indictment, the Defendants, BRAULIO JIMENEZ, REYNALDO PEREZ  
5                   MUNOZ, VICTOR JIMENEZ, ANNA MUNOZ, and MARISELA MENDOZA,  
6                   shall forfeit to the United States of America, any property constituting, or derived  
7                   from, any proceeds obtained, directly or indirectly, as the result of such offense(s)  
8                   and any property used or intended to be used, in any manner or part, to commit or  
9                   to facilitate the commission of the offense(s). The property to be forfeited  
10                   includes, but is not limited to, the following:

11                   DEFENDANT BRAULIO JIMENEZ Counts 1 and 5 - 8:

12                   U.S. CURRENCY

13                   -\$172,390.28 in U.S. currency, seized by the Federal Bureau of  
14                   Investigation on or about February 14, 2018.

15                   FIREARMS/AMMUNITION

16                   - Kimber Pro Carry II with magazine, serial number: KR241904;  
17                   - six (6) rounds of Hornady .45 ammunition;  
18                   - Premier Trail Blazer .22 rifle, serial number: 3735K;  
19                   - .223 Rifle with magazine, unknown make and model, no serial number;  
20                   - Nineteen (19) rounds of .223 ammunition;  
21                   - one box containing six (6) rounds of .45 ammunition;  
22                   - one bag containing two (2) rounds of .223 ammunition;  
23                   - Twenty-five (25) rounds of .45 ammunition;

1       - Colt 1911 style pistol with blue grip and (2) magazines, serial number:  
2                    38SS07763;  
3       - Colt 1911 style pistol with white grip and (2) magazines, serial number:  
4                    38SS07790;  
5       - Ruger SR 9 with (two) magazines, serial number: 331-97592;  
6       - Taurus 1911 style pistol with chrome receiver, gold colored accents and  
7                    black grip with (2) magazines, serial number: LCM58208;  
8       - Mixed ammunition;  
9       - Two (2) rifle magazines and one (1) pistol magazine; and, a  
- Box of 9mm ammunition.

10      DEFENDANT REYNALDO PEREZ MUÑOZ Count 1:

11      U.S. CURRENCY

12       - \$172,390.28 in U.S. currency, seized by the Federal Bureau of  
13                    Investigation on or about February 14, 2018.

14      REAL PROPERTY

15      All that lot or parcel of land, together with its buildings,  
16                    appurtenances, improvements, fixtures, attachments and  
17                    easements, known as 1703 N. 17<sup>th</sup> Avenue, Pasco, Washington,  
18                    legally described as follows:

19      Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in  
20                    Volume C of Plats, Page 25, records of Franklin County, Washington

21      Assessor's Parcel No.: 113352300

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1           DEFENDANT VICTOR JIMENEZ Counts 5 - 8:

2           U.S. CURRENCY

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4           - \$172,390.28 in U.S. currency, seized by the Federal Bureau of  
5           Investigation on or about February 14, 2018.

6           FIREARM

7           - Mossberg .22 caliber rifle, serial number: EMJ3962984.

8           DEFENDANT ANNA MUÑOZ Count 1:

9           REAL PROPERTY

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11           All that lot or parcel of land, together with its buildings,  
12           appurtenances, improvements, fixtures, attachments and  
13           easements, known as 1703 N. 17<sup>th</sup> Avenue, Pasco, Washington,  
14           legally described as follows:

15           Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in  
16           Volume C of Plats, Page 25, records of Franklin County, Washington

17           Assessor's Parcel No.: 113352300

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19           If any of the property described herein, as a result of any act or omission of  
20           the Defendant(s):

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22           a.       cannot be located upon the exercise of due diligence;

23           b.       has been transferred or sold to, or deposited with, a third party;

24           c.       has been placed beyond the jurisdiction of the court;

25           d.       has been substantially diminished in value; or

26           e.       has been commingled with other property which cannot be divided  
27                   without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p).  
3

4 **MONEY LAUNDERING FORFEITURES**

5 Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of a money laundering  
6 offense(s) in violation of 18 U.S.C. § 1956, as charged in this Superseding  
7 Indictment, Defendants BRAULIO JIMENEZ and REYNALDO PEREZ MUNOZ  
8 shall forfeit to the United States of America, any property, real or personal,  
9 involved in such offense, and any property traceable to such property. The  
10 property to be forfeited includes, but is not limited to, the following:  
11

12 **DEFENDANT BRAULIO JIMENEZ** Counts 3 and 4:  
13

14 **MONEY JUDGMENT**

15 -A sum of money equal to \$630,200.00 in United States currency  
16 representing the total amount involved in the money laundering  
17 offense charged in Count 3 of this Indictment.  
18

19 **U.S. CURRENCY**  
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21 -Approximately \$280,031.00 in United States currency, seized by the  
22 Federal Bureau of Investigation, on or about February 2, 2018; which  
23 currency was involved in the money laundering offense charged in  
Count 4 of this Indictment.  
24

25 **DEFENDANT REYNALDO PEREZ MUNOZ** Counts 2 – 4:  
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27 **REAL PROPERTY**  
28

- All that lot or parcel of land, together with its buildings,  
appurtenances, improvements, fixtures, attachments and

1 easements, known as 1703 N. 17<sup>th</sup> Avenue, Pasco, Washington,  
2 legally described as follows:

3 Lot 10, Block 2 Lindner Addition, according to the plat thereof recorded in  
4 Volume C of Plats, Page 25, records of Franklin County, Washington

5 Assessor's Parcel No.: 113352300  
6

7 **MONEY JUDGMENT**

8 -A sum of money equal to \$380,070.00 in United States currency  
9 representing the total amount involved in the money laundering  
10 offense charged in Count 2 of this Indictment.

11 **MONEY JUDGMENT**

12 -A sum of money equal to \$630,200.00 in United States currency  
13 representing the total amount involved in the money laundering  
14 offense charged in Count 3 of this Indictment.

15 **U.S. CURRENCY**

16 -Approximately \$280,031.00 in United States currency, seized by the  
17 Federal Bureau of Investigation, on or about February 2, 2018, which  
18 currency was involved in the money laundering offense charged in  
19 Count 4 of this Indictment.

20 If any forfeitable property, as a result of any act or omission of the

21 Defendant(s):

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- 23 a. cannot be located upon the exercise of due diligence;
- 24 b. has been transferred or sold to, or deposited with, a third party;
- 25 c. has been placed beyond the jurisdiction of the court;
- 26 d. has been substantially diminished in value; or
- 27 e. has been commingled with other property which cannot be divided  
28 without difficulty,

1 the United States of America shall be entitled to forfeiture of substitute property  
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28  
3 U.S.C. § 2461(c).

4 DATED this 19 day of June 2018.

5  
6 A TRUE BILL

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9   
10 Joseph H. Harrington  
11 United States Attorney

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13 Stephanie A. Van Marter  
14 Assistant United States Attorney